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11 *Representing the United States of America*

12  
13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 vs.

18 SHAVONTE HILL,

19 Defendant.

20 Case No. 2:17-cr-00132-JAD-NJK

21 **STIPULATION FOR A**  
22 **PROTECTIVE ORDER**

23 The parties, by and through the undersigned, respectfully request that the Court issue an  
24 Order protecting from disclosure to the public, or any third party not directly related to this case,  
any recordings produced by the Government during discovery under Bates stamp number PO 1  
(the “Protected Material”). The parties state as follows:

25 1. A petition to revoke Defendant Shavonte Hill’s supervised release was filed on  
26 November 25, 2020.

27 2. A revocation hearing is currently scheduled for January 4, 2021.

28 3. Under Federal Rule of Criminal Procedure 32.1(e), the government intends to  
29 produce statements of witnesses in preparation for the scheduled revocation hearing, including  
30 statements contained in Bates stamp number PO 1.

1       4. The petition in this case arises out of a traffic stop of the defendant which resulted  
2 in a firearm being located in his vehicle and there are several bodycam videos of the relevant  
3 events which contain statements of potential witnesses. The bodycam videos designated by Bates  
4 PO 1 include personal identifying information of potential witnesses.

5       5. In order to protect the witnesses involved in and revealed by the Protected  
6 Material, the parties intend to restrict access to the Protected Material in this case to the following  
7 individuals: the defendant, attorneys for all parties, and any personnel that the attorneys for all  
8 parties consider necessary to assist in performing that attorneys' duties in the prosecution or  
9 defense of this case, including investigators, paralegals, experts, support staff, interpreters, and  
10 any other individuals specifically authorized by the Court (collectively, the "Covered  
11 Individuals").

12       6. Without leave of Court, the Covered Individuals shall not:

13           a. make copies for, or allow copies of any kind to be made by any other  
14              person of the Protected Material in this case or permit dissemination of the  
15              Protected Material at the Pahrump jail facility, or any other detention  
16              facility where the Defendant is housed, to include leaving a copy of the  
17              Protected Material at any detention facility where the Defendant is housed;  
18           b. allow any other person to read, listen, or otherwise review the Protected  
19              Material;  
20           c. use the Protected Material for any other purpose other than preparing to  
21              defend against or prosecute the charges in the indictment or any further  
22              superseding indictment arising out of this case; or  
23           d. attach the Protected Material to any of the pleadings, briefs, or other court  
24              filings except to the extent those pleadings, briefs, or filings are filed under

1 seal.

2 7. Nothing in this stipulation is intended to restrict the parties' use or introduction of  
3 the Protected Material as evidence at trial or support in motion practice.

4 8. The parties shall inform any person to whom disclosure may be made pursuant to  
5 this order of the existence and terms of this Court's order.

6 9. Should a reasonable need for this protective order cease to exist, on grounds other  
7 than a Covered Individual or some other person violating or circumventing its terms, the  
8 government will move expeditiously for its dissolution.

9 10. The defense hereby stipulates to this protective order.

10 Respectfully submitted,  
11 For the United States:

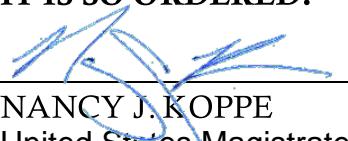
12 NICHOLAS A. TRUTANICH  
13 United States Attorney

14 /s/  
15 CHRISTOPHER BURTON  
16 Assistant United States Attorney

17 For the Defense:

18 /s/  
19 ANDREW LEAVITT, ESQ.  
20 Attorney for SHAVONTE HILL

21 **IT IS SO ORDERED:**

22   
23 NANCY J. KOPPE  
24 United States Magistrate Judge

December 15, 2020

25 Date